



**Australian
Privacy
Foundation**

<http://www.privacy.org.au>

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<http://www.privacy.org.au/About/Contacts.html>

03/07/2014

Marc Vickers
Mr Marc Vickers
Assistant Secretary
Digital Government Strategy
Department of Finance

Dear Marc Vickers,

Re: Draft Guide to Responsible Data Analytics

The Australian Privacy Foundation (APF) is the country's leading privacy advocacy organisation. A brief backgrounder is attached.

The APF welcomes the opportunity to provide input to AGIMO regarding the draft of the Guide to Responsible Data Analytics, previously we submitted feedback for the March 2013 Big Data Strategy Issues Paper which can be viewed at <http://www.privacy.org.au/Papers/AGIMO-BD-130407.pdf>.

Per our previous submission from 2013, the ongoing challenge for AGIMO, the ATO and other public sector stakeholders in the proposed Strategy is to go beyond the generalities presented in the latest draft Strategy. Failure to do so continues to erode potential community support for the Strategy and raises inconvenient questions about individual agency initiatives.

The Issues Paper at page 6 highlights 'Open Engagement'. The Foundation submits that this will not be achieved unless and until AGIMO, the Big Data Working Group and the ATO Data Analytics Centre of Excellence directly involve the Foundation and other relevant civil society organisations in their meetings and distributions of drafts.

In this regard, we note that, despite APF's previous active involvement, your organisation failed to inform us of the publication of the draft, and we had to learn about it from other sources. For effective engagement to be achieved, it is essential that your organisation establish, retain and consistently interact with a list of relevant civil society organisations.

We look forward to further discussions regarding this topic. Thank you for your consideration.

Yours sincerely

Mark Walkom
APF Secretary

Australian Privacy Foundation

Background Information

The Australian Privacy Foundation (APF) is the primary national association dedicated to protecting the privacy rights of Australians. The Foundation aims to focus public attention on emerging issues that pose a threat to the freedom and privacy of Australians. The Foundation has led the fight to defend the right of individuals to control their personal information and to be free of excessive intrusions.

The APF's primary activity is analysis of the privacy impact of systems and proposals for new systems. It makes frequent submissions to parliamentary committees and government agencies. It publishes information on privacy laws and privacy issues. It provides continual background briefings to the media on privacy-related matters.

Where possible, the APF cooperates with and supports privacy oversight agencies, but it is entirely independent of the agencies that administer privacy legislation, and regrettably often finds it necessary to be critical of their performance.

When necessary, the APF conducts campaigns for or against specific proposals. It works with civil liberties councils, consumer organisations, professional associations and other community groups as appropriate to the circumstances. The Privacy Foundation is also an active participant in Privacy International, the world-wide privacy protection network.

The APF is open to membership by individuals and organisations who support the APF's Objects. Funding that is provided by members and donors is used to run the Foundation and to support its activities including research, campaigns and awards events.

The APF does not claim any right to formally represent the public as a whole, nor to formally represent any particular population segment, and it accordingly makes no public declarations about its membership-base. The APF's contributions to policy are based on the expertise of the members of its Board, SubCommittees and Reference Groups, and its impact reflects the quality of the evidence, analysis and arguments that its contributions contain.

The APF's Board, SubCommittees and Reference Groups comprise professionals who bring to their work deep experience in privacy, information technology and the law.

The Board is supported by Patrons The Hon Michael Kirby AC CMG and The Hon Elizabeth Evatt AC, and an Advisory Panel of eminent citizens, including former judges, former Ministers of the Crown, and a former Prime Minister.

The following pages provide access to information about the APF:

- Policies <http://www.privacy.org.au/Papers/>
- Resources <http://www.privacy.org.au/Resources/>
- Media <http://www.privacy.org.au/Media/>
- Current Board Members <http://www.privacy.org.au/About/Contacts.html>
- Patron and Advisory Panel <http://www.privacy.org.au/About/AdvisoryPanel.html>

The following pages provide outlines of several campaigns the APF has conducted:

- The Australia Card (1985-87) <http://www.privacy.org.au/About/Formation.html>
- Credit Reporting (1988-90) <http://www.privacy.org.au/Campaigns/CreditRpting/>
- The Access Card (2006-07) http://www.privacy.org.au/Campaigns/ID_cards/HSAC.html
- The Media (2007-) <http://www.privacy.org.au/Campaigns/Media/>